



**State & Federal Contractors
Water Agency**

1121 L Street, Suite 1045, Sacramento, CA 95814

January 14, 2011

Sacramento-San Joaquin Delta Conservancy
c/o Ms. Nancy Ullrey
3500 Industrial Blvd
West Sacramento, CA 95691

Dear Ms. Ullrey:

The State and Federal Contractors Water Agency (SFCWA)* appreciates the opportunity to provide the following comments and suggested edits regarding the draft Interim Strategic Plan to be considered by the Conservancy at its January 19, 2011 meeting. We look forward to working constructively with the Conservancy as it moves forward in seeking to achieve its mission consistent with the direction provided in its authorizing legislation.

[Note: The following comments are based upon the redline version of the draft recommended by the Strategic Plan subcommittee.]

Page 7, ¶ 2, Line 1: The recommended change from "a primary state agency" to "the primary state agency" is inappropriate and inconsistent with the Conservancy's authorizing legislation (see section 32322). The legislative language should be used. This comment also applies to Page 11, ¶ 1, Line 1; Page 15, 1st bullet, Line 1; Page 23, 1st bullet, Line 1; Page 41, Long-Term Goal heading in the middle of the page; and, Page 41, last line of the page.

Page 7, ¶ 4, Line 5: With regard to the coequal goals of ecosystem restoration and improved water supply reliability, no single agency or plan will achieve them. It will take complementary efforts by many. Consequently, we suggest rather than "will accomplish this broad mission" either "will help accomplish this broad mission" or "will contribute to the accomplishment of this broad mission".

Page 8, ¶ 4, Line 3: Considering the statutory deadline of two years after the hiring of an Executive Officer (which is expect to be done this year (2011)), it would seem that the interim strategic plan would be superseded in 2013, and not be controlling "through 2014". This should be revised or an explanation provided as to why "through 2014" is considered appropriate.

* SFCWA is a Joint Powers Authority of water contractors that receive water from the State Water Project and the Central Valley Project. Together, SFCWA members serve over 25 million Californians and provide water to irrigate more than 3 million acres of the nation's most productive agricultural lands. SFCWA's mission is to assist its member agencies in assuring a sufficient, reliable and high quality water supply for their customers and maximize the efficient operation and integration of the State Water Project and federal Central Valley Project.

Directors

James M. Beck
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Page 12, ¶ 2, Line 5: "parts of" should be left in the description since the entire Yolo Bypass is not within the Delta, which, along with the Suisun Marsh, is the legislated jurisdictional limit of the Conservancy's authority (see section 32360(a)), unless and until the Conservancy makes specific findings consistent with section 32360.5 regarding a proposed activity that will occur outside the Delta or Suisun Marsh.

Page 17, ¶ 3, Line 2: The statement that the Conservancy believes it will complete the "final strategic plan in 2011" is confusing when considered in conjunction with the statement on page 8 regarding the interim plan being utilized "through 2014" and the legislative deadline for the strategic plan to be completed within two years of the hiring of the Executive Officer, which will also occur in 2011. It would seem more appropriate to substitute "final strategic plan by the end of 2013."

Page 22, last bullet, Line 4: Because the Delta is not the source of the water conveyed through the Delta to the State Water Project (SWP) and federal Central Valley Project (CVP) pumping plants, the use of "providing" is inaccurate. Instead, we suggest "including its central role in the delivery of water supplies to two-thirds of the state". This comment is also applicable to Page 37, 5th bullet, Line 3.

Page 25, ¶ 3, Line 4: The Delta-Suisun is not the "major source of California's water supply". The source of water supply for the state is precipitation, particularly that which falls as snow in the Sierra Nevada. In the context of this paragraph, this clause should be deleted so the language reads "The Delta-Suisun is an ecological treasure..."

Page 25, ¶ 4, Line 2: insert "portions of" prior to "5 counties" to be more accurate.

Page 25, ¶ 4, Line 6: substitute "contributes to" for "supports".

Page 25, last line of page: delete "critical" because "critical habitat" is a term of art related to species being regulated under the Endangered Species Act and this sentence references all species in the Delta, not just those of special concern.

Page 27, 4th bullet: the water delivered by the SWP/CVP is not "from the Delta"; rather, it is "conveyed through the Delta". The East Bay Area's supply reference is diverted upstream of the Delta (EBMUD), from the Delta (CCWD), and transported across the Delta (Zone 7, ACWD). Surprisingly, there is no mention of the major upstream diversion of the SFPUC. Finally, the SWP/CVP serve more than 3 million acres of agricultural lands, rather than the 2.5 million mentioned. We suggest the following rewrite of the bullet into two bullets:

- About 2/3 of Californians rely on water transported across the Delta for some portion of their drinking water, including many residents of the East and South Bay Area; and more than 3 million acres of agricultural land outside of the Delta are irrigated with water pumped by SWP and CVP facilities in the southern Delta.
- The East Bay Municipal Utility District and the San Francisco Public Utilities Commission rely on water diverted out of the Delta watershed, upstream of the Delta, to serve their customers.

Page 27, 5th bullet: water quality isn't affected by "water exported from the Delta"; it's the SWP/CVP operations that affect hydrodynamics with impacts to water quality in certain

locations. We suggest changing "water exported from the Delta" to "water diversions, water project operations". Also, the last sentence that "The Delta is managed to control salinity" is a much too narrow statement. Water management related to the Delta has multiple objectives. This sentence should be deleted.

Page 27, last bullet: The figures in this bullet do not appear to be consistent with the figures included in the Delta Protection Commission's draft Economic Sustainability Plan (ESP). While the population figure is fairly close, the ESP indicates a jobs total in the Delta of 146,000 (rather than 250,000), with approximately 8,000 of those in the Primary Zone. In addition, the use of the \$35 billion figure is not consistent with the \$20 billion figure stated in the ESP. Moreover, the ESP's statement that "the available data were not adequate to generate an updated estimate of the total dollar value of the Delta economy" begs the question of where these figures were derived and they should either be changed to be consistent with the ESP or a source should be cited.

Page 29, ¶ 1, Lines 6-7: More numerous and more intense flood events are also a predicted impact of climate change, and it should be included in the list as well.

Page 29, ¶ 2, Lines 2-3: The use of "degree" and "committed" are awkward. We suggest simply stating "...adapting to the consequences of climate change."

Page 29, ¶ 3, Line 8: substitute "adaptation" for "adaption".

Page 30, ¶ 2, Line 3: To assert that the Conservancy "will take a lead role in shaping the ecosystem restoration section of the Delta Plan" is inappropriate. Certainly the Conservancy may provide input and comment, but it is the Delta Stewardship Council that will develop all sections of the Delta Plan. Moreover, most of the ecosystem restoration components of the Delta Plan have already been essentially determined in the context of the Delta Counties' local HCPs and the Bay Delta Conservation Plan's Conservation Measures. We suggest changing this sentence to read, "The Conservancy will help to shape the ecosystem restoration section..." This comment is also applicable to Page 41, Item 3 under Near-Term Strategies at the bottom of the page.

Page 40, ¶ 1, Line 8: Because the legislative mandate is that the Conservancy adopt its strategic plan within two years of hiring its Executive Officer, "next three years" should be changed to "next two years", as that is when the interim strategic plan will be superseded. This comment is also applicable to Page 44, ¶ 1, Line 4.

Thank you for your consideration.

Sincerely,



Byron M. Buck
Executive Director